

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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ADAM TW GRAY,

Plaintiff,

- against -

MAHESH SHAHDADPURI, and
TASC LABOUR SERVICES LLC, d/b/a
TASC OUTSOURCING,

Defendants.

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Index No. _____

AMENDED COMPLAINT

Jury Trial Demanded

Plaintiff Adam Thomas William Gray ("Gray"), by and for his Complaint against Defendants Mahesh Shahdarpuri ("Shahdarpuri") and TASC Labour Services LLC ("TASC" or "TASC Outsourcing"), alleges upon personal knowledge as to his own acts and experiences, and upon information and belief as to all other matters:

NATURE OF ACTION

1. This case arises from an extraordinary abuse of a foreign legal system to exact personal revenge and then conceal it for over a decade. In late 2009, Defendant Mahesh Shahdarpuri - a failed New York tech founder whose father resolved his million-dollar debts - personally recruited Gray from his position as the top-performing consultant at a rival UAE staffing firm. Shahdarpuri promised they would "build the company together as partners," offering future equity in exchange for Gray sacrificing his own immediate opportunities. From 2010 to 2012, Gray transformed TASC from a \$4 million firm with just seven core staff, operating out of shared office space with Shahdarpuri's father's conglomerate, into a \$30 million regional powerhouse. This was not merely financial growth; Gray rebuilt the company's operational and ethical foundation. He eradicated draconian practices like passport retention, replacing them with professional, SLA-driven departments. This fundamental shift

towards integrity, capped by a move to premium corporate offices, was critical to securing the trust of blue-chip clients like Microsoft, L'Oréal and Pfizer.

2. This meteoric rise saw TASC Outsourcing win "Fastest Growing Company in the Middle East" two years running. Yet as profits soared, Shahdarpuri's promises soured. Bonuses were withheld, equity thresholds shifted and his behavior grew increasingly erratic - cycling through four assistants he reduced to tears, demanding cash bribes be delivered to client contacts and exhibiting a paranoid obsession with control. The partnership promises that lured Gray from competitors proved to be carefully constructed lies. In October 2012 when Gray resigned to start his own business, Shahdarpuri orchestrated a corporate theater of farewell - publicly, he provided a cake reading "TO BIG BILLER ADAM" and speeches praising Gray in front of the entire office. Privately, just hours later in a Tim Hortons Cold Stone Creamery on Sheikh Zayed Road, Shahdarpuri dropped his mask and threatened to jail Gray if he hurt TASC in the future. When Gray refused this extortion and documented it via email to management, Shahdarpuri's response was swift: freeze Gray's bank accounts at multiple institutions despite no default, rendering him financially crippled during his transition. The message was clear - submit or be destroyed.

3. Fourteen months later, while TASC Outsourcing publicly solicited Gray's collaboration, Shahdarpuri secretly activated his revenge. He presented prosecutors with six routine workplace documents bearing his own handwritten fabrications ("The Vendetta Files"). When Dubai Police initially refused to open a case for lack of merit, he persisted, appealing to the Public Prosecution and demanding a private audience. When the case was twice referred back and the authorities still declined to proceed, Shahdarpuri took the final, decisive step: he appeared personally at the Bur Dubai police station on February 2, 2014 to deliver his own false testimony. Just three days later, his efforts succeeded and the secret arrest warrant and travel ban was issued.

4. For the next eleven years, this secret warrant would function as an invisible prison, blocking Gray from the UAE and rendering him un-investable to New York capital markets that require clean background checks. Shahdarpuri's goal was not justice but either entrapment or exile:

to bar Gray from the UAE and wider GCC region, punish his refusal to submit to extortion and neutralize him as a potential competitor. This entire campaign was prosecuted with calculated duplicity. Between 2013 and 2017, despite Gray being labelled a criminal by Shahdadpuri, TASC Outsourcing continued to solicit business, partnerships and benefit from Gray's enterprise. Between 2018 and 2023, Gray made documented good faith efforts to contact Defendants which culminated in a 2023 direct request about any criminal or civil cases. No substantive response or clarification was ever received from either Shahdadpuri or TASC leadership. In 2025, after 18 months of working with UAE legal counsel, Gray obtained official records which included police and prosecution filings, internal correspondence and attached evidence with handwritten insignia from Shahdadpuri, confirming the complaint's content, timing and procedural history. As former TASC Outsourcing Senior Vice President Abbas Ali ("Ali") would later confirm in 2025, Shahdadpuri deliberately concealed the proceedings from anyone who might "influence him or go tell" Gray, admitting the explicit purpose was to ensure Gray "would not be able to enter the country."

5. This entire covert campaign was prosecuted while Defendant Shahdadpuri meticulously curated a public persona of a benevolent philanthropist and business visionary, posing for selfies with figures like Bill Gates (Exhibit 1) and proclaiming on LinkedIn that his corporate culture is "how we show up when no one's watching" (Exhibit 2). This "Jekyll-and-Hyde" conduct is not a defense; it is proof of a calculated, compartmentalized malice, demonstrating he was fully aware of the consequences of his secret war against Gray. While Gray built successful ventures despite these constraints, he was forced to operate under constant, undisclosed legal risk that foreclosed opportunities worth millions. With the ban now formally dismissed and its malicious origins confirmed through official records, Gray brings claims for False Imprisonment (Constructive Confinement Via Wrongful Use Of A Foreign Legal System) and Intentional Infliction Of Emotional Distress, seeking declaratory and monetary relief for the reputational and psychological harm inflicted by Defendants' prolonged campaign of deceit.

PARTIES

6. Plaintiff Adam Thomas William Gray is a British entrepreneur who, at all relevant times, operated international businesses with commercial interests involving New York. From February 2010 until October 2012, after being personally recruited by Shahdadpuri, Gray served in senior roles at TASC Outsourcing, rising to Vice President (Exhibit 3) - the company's most senior position after CEO.

7. Defendant Mahesh Shahdadpuri is an Indian national residing, on information and belief, in Dubai, United Arab Emirates. As founder and Chief Executive Officer of TASC Outsourcing, he personally directed the policies and legal decisions challenged in this action both through his own acts and through counsel acting under his duly executed Power of Attorney (Exhibit 4).

8. Defendant TASC Outsourcing is a staffing company headquartered in Dubai, United Arab Emirates, which regularly solicits business from U.S. clients, including multinational corporations operating in New York.

JURISDICTION & VENUE

9. This Court has jurisdiction over Defendants under CPLR 302(a)(1) and, in the alternative, CPLR 302(a)(3)(ii).

10. Defendants' initiation and continued concealment of ex-parte criminal proceedings in the UAE - coupled with its refusal to clarify the nature or existence of such proceedings when directly asked - created undisclosed legal risk that impaired Plaintiff's ability to engage New York investors and business partners.

11. Defendant Shahdadpuri has maintained ongoing, purposeful ties to the United States. He founded and operated Ad Astrum Technologies in New York City for four years, serves on the Boston University Questrom School of Business Advisory Board (Exhibit 5) and has appeared on

Forbes and Bloomberg business-leader lists; he is also a chapter chair of the Young Presidents' Organization (YPO) and a charter member of TiE, a global non-profit that fosters entrepreneurship through mentorship and networking. He earned a business degree from Harvard University and also serves as a director of his father's global conglomerate, Nikai, which exports to over 60 countries.

12. Defendant TASC Outsourcing targets the U.S. market and today serves 400-plus corporate customers, including American multinational brands such as Microsoft, General Motors and New-York based Pfizer. On information and belief, TASC has collected over \$10 million in revenue during the relevant period. Outreach is active: in March 2024 TASC Outsourcing sponsored and presented at the Staffing Industry Analysts (SIA) Executive Forum in Las Vegas (Exhibit 6), where CEO Shahdadpuri delivered a keynote promoting TASC's services to investors and businesses nationwide - including those based in New York.

13. Venue is proper in New York County under CPLR 503(a) because a substantial part of the resulting business injury was sustained within this County.

FACTUAL BACKGROUND

A. Recruitment And Onboarding

14. In late 2009 Gray was personally recruited by Shahdadpuri to join TASC as a Sales Manager with the understanding he would step into a leadership role following the recent dismissal of the company's General Manager for performance-related issues. At the time Gray was the top-performing consultant at a competing UAE recruitment agency (Exhibit 7) and had been offered equity to launch a new division. His portfolio included major multinational clients such as HSBC, EMC, Siemens, AXA and IBM.

15. Prior to joining TASC in February 2010, Gray had built a diverse professional and entrepreneurial background: a B.Sc (Hons) in Immunology from the University of Glasgow, two Royal Navy flying scholarships and six months as a Royal Marines Officer at the Commando Training Centre Royal Marines. He had worked at a leading recruitment firm in London serving FTSE-100

clients, founded his own fitness business - including a product long-listed for the Enterprising Young Brits Award and launched a property-tech platform featured on Dubai radio and named runner-up on Falcon's Lair, the UAE's version of Dragons' Den. These experiences gave Gray the Western credibility and entrepreneurial track record TASC needed to win the trust of multinational clients and reposition itself as a serious regional player.

16. On information and belief, based on statements Shahdadpuri made to Gray, between 1999 and 2003, Shahdadpuri founded Ad Astrum Technologies in New York City. Following its closure amid approximately \$1 million in liabilities, which his father Paras Shahdadpuri resolved, he returned to Dubai to work in various positions at his father's company, Nikai Group, a consumer electronics conglomerate.

17. In 2007, Shahdadpuri obtained an 'on-demand labour supply' license - a category restricted to UAE nationals and requiring seven-figure deposits. This license class, originally designed for construction labor, enabled companies to sponsor workers' visas and manage their employment.

18. By 2010, TASC's primary contracts consisted of IT staff for Emirates Airlines and a new call center operation for Etisalat, generating modest revenue. The company operated out of shared space within Nikai's offices in Bur Dubai, with a core office headcount of approximately seven people.

19. Gray accepted Shahdadpuri's offer based on explicit promises to 'build the company together as partners' and assurances of future equity participation. Unlike Plaintiff's then-employer, TASC possessed the restricted license required for contract staffing, enabling execution of their shared vision.

20. Concerned about a possible non-compete claim, Shahdadpuri insisted that Gray work under a Free Zone (non mainland) visa sponsored by his father's company, rather than under TASC's sponsorship.

21. Upon joining, Shahdadpuri's attempts at control became immediately apparent. He requested that Gray surrender his passport to be kept in a company safe, a standard TASC policy at the time for all staff, including its outsourced workforce. This practice, known as passport retention, is widely condemned as a tool for restricting employee movement. Gray immediately refused to comply. He later worked to successfully reverse this policy, recognizing that passport retention was a significant barrier to positioning TASC as a credible and trusted partner for multinational corporations that adhere to global ethical standards.

22. Over the course of 2010, 2011, and into late 2012, Gray played a central role in scaling the company from approximately \$4 million in annual turnover with limited profitability to over \$30 million in revenue and estimated net margins of 8-10%.

B. Contributions To Growth And Internal Advancement

23. Gray was promoted twice, first to Senior Manager, then to Vice President in early 2012 - becoming the most senior employee by title and, at all relevant times, the highest-paid after Shahdadpuri, with responsibilities spanning all areas of the business.

24. During this period of growth, TASC Outsourcing was later recognized as the "Fastest Growing Company in the Middle East" in both 2011 and 2012 (Exhibit 8) - an accolade significantly contributed to by Gray's vision and performance.

25. During this time, Gray was closely involved with key client relationships and helped position TASC Outsourcing as a trusted partner to leading multinational brands such as Microsoft, L'Oréal, Emirates Airlines, Etihad, Sony, P&G, Pfizer, Audi, Samsung, Thomson Reuters and General Motors.

C. Breakdown Of Trust And Constructive Termination

26. As TASC Outsourcing grew, Shahdadpuri frequently referenced third-party interest in the company being acquired and repeated verbal assurances were made to Gray that he would receive a multi-million-dollar payout in the event of a sale.

27. In 2011, while Gray was on track to meet agreed performance targets, Shahdadpuri attempted to withhold a six-figure bonus - marking the first major breakdown in financial trust.

28. A partial payment was made but only after Gray signed an addendum imposing restrictive terms on future bonuses. In addition, approximately 15% was withheld without clear justification and was never released.

29. The working relationship deteriorated throughout 2012 as Shahdadpuri's behavior became increasingly erratic. He cycled through four Executive/Personal Assistants during Gray's tenure, several of whom, on information and belief, left in tears over his verbal abuse. Shahdadpuri himself told Gray that one assistant had been so upset she phoned his wife crying, asking: "How can you be married to such a horrible man?" This statement, offered to show Shahdadpuri's own awareness of the turmoil he was causing, underscores the hostile environment prevailing at TASC Outsourcing.

30. His business practices proved equally troubling. After hiring candidates and shaking hands on start dates, he would instruct Gray to "see if we can find someone else before they start."

31. Shahdadpuri's verbal promises of equity were subject to constantly shifting goalposts. Initially, the threshold was securing 5 major clients; once achieved, it was raised to 10 and so on. Even after Gray's performance met the financial targets for 2011 that were supposed to trigger an equity grant, Shahdadpuri deferred the matter, claiming he had not yet finalized an equity 'scheme'. Ultimately, despite Gray achieving targets presented to him, all partnership discussions were perpetually deferred.

32. As the company grew, Shahdadpuri's leadership became defined by a paradoxical combination of extreme risk aversion and reckless, unethical conduct. This paradox stemmed, on information and belief, from TASC's initial contract with a major telecoms provider ("TP"). In that engagement, inadequate employee screening protocols resulted in TASC Outsourcing supplying workers whom TP subsequently alleged were involved in a large-scale SIM-card fraud scheme. On information and belief, faced with legal threats and demands for multi-million-dirham damages,

TASC, after initially disclaiming responsibility, ultimately resolved the matter. The incident and its financial exposure left Shahdadpuri with an acute paranoia regarding liability.

33. This paranoia began to actively harm the business. New client contracts in various sectors were delayed or lost entirely due to Shahdadpuri's refusal to accept standard commercial terms. For example, a fully negotiated contract with Microsoft was needlessly delayed for approximately seven months as Shahdadpuri disputed routine liability clauses, jeopardizing the relationship with a key multinational partner. Another major oil & gas contract was lost completely.

34. Yet, this extreme caution in formal contracts was paradoxically coupled with a pattern of unethical practices to manage cash flow. This pattern first became apparent to Gray in or about mid-2011. After TP had allegedly fallen into arrears, an internal meeting was held, attended by Gray, Shahdadpuri and Senior Manager Ali. At the meeting, Shahdadpuri was informed by Ali that a TP finance officer had conditioned the release of invoices on a personal cash payment. In response, Gray advised against this course of action, proposing instead that Shahdadpuri either utilize his available family financing – which he had done previously – to manage the shortfall or escalate the payment issue to TP's senior management. Shahdadpuri rejected both ethical alternatives and instructed Ali to arrange the requested cash delivery.

35. On information and belief, this method of resolving commercial disputes by delivering cash payments to client personnel was repeated on other occasions in 2011 and 2012. Gray understood these directives were intended to improperly influence client staff to expedite payments and secure future business, creating an untenable and ethically compromised environment. Plaintiff expects TASC's bank and petty-cash records - obtainable in discovery - to show a pattern of significant and unusual cash withdrawals corresponding to these events, often made shortly before invoices from the clients in question were settled.

36. By October 2012, Gray recognized the pattern: emotional volatility, broken promises and ethical compromises that jeopardized the company's integrity. The subsequent demand for an

illegal blank check merely confirmed what the preceding months had revealed - Shahdadpuri operated through intimidation, manipulation and when necessary, corruption.

37. On Saturday 6 October 2012, at a meeting at the Montgomerie Golf Club in Emirates Hills, Dubai, Gray informed Shahdadpuri of his intention to leave the company and start a non-competing business.

38. Gray's official notice period was 30 days; however, he proposed two structured exit options involving compensation adjustments tied to an extended handover. Shahdadpuri was shocked at the resignation and stated "I would never sack you Adam" and eagerly agreed to the longer transition and revised payment terms via handshake.

39. On Monday 8 October, Shahdadpuri invited Gray into his office and demanded Gray's immediate resignation with the standard 30-day notice period.

40. The 30-day notice period that followed was marked by Shahdadpuri's escalating paranoia and control. He subjected Gray to a series of meetings, repeatedly questioning his future plans and demanding assurances that he would not harm TASC's business. In an unusual step, Shahdadpuri personally accompanied Gray to every client handover meeting, a clear demonstration of his profound distrust. This climate of intense and unwarranted suspicion culminated in Shahdadpuri's final, coercive demand at the end of the notice period.

D. Post-Employment Activities And Threats Of Retaliation

41. On Gray's final day in the office, Shahdadpuri organised a cake with the caption "TO BIG BILLER ADAM" (Exhibit 9) and farewell speech in front of the whole Dubai office. Afterwards Shahdadpuri requested a face-to-face meeting with Gray in a Tim Hortons Cold Stone Creamery on Sheikh Zayed Road close to TASC Outsourcing's head office.

42. After a cordial start, Shahdadpuri issued a direct threat to jail Gray if he later believed he harmed TASC Outsourcing in any way post departure.

43. Specifically, to ensure Shahdadpuri could do that, he asked Gray to provide a signed blank cheque as a condition for releasing his final salary and end-of-service benefits “believing Gray needed the money”. This was an illegal practice under UAE law.

44. Under the prevailing UAE law of that period, a bounced cheque was not just a civil matter but a criminal offense punishable by imprisonment. This legal reality transformed blank cheques into potent tools of coercion, often used as security guarantees that empowered the holder to initiate criminal proceedings.

45. Gray forcefully rejected the ultimatum, telling Shahdadpuri in no uncertain terms to keep the money and ended the meeting.

46. Immediately after the confrontation, Gray e-mailed TASC’s senior management recounting Shahdadpuri’s demand for a blank cheque, confirming that he had no intention to compete and noting his ongoing assistance during the hand-over (Exhibit 10). Years later, Shahdadpuri submitted the same e-mail to Dubai authorities as part of The Vendetta Files adding a handwritten caption that re-cast Gray’s refusal as a “threat” and was used to support the criminal complaint.

47. In early November 2012, TASC’s CFO confirmed by email that “Mahesh told me last evening that he will pay you full settlement with everything included”, yet the company had already triggered a discretionary bank freeze on his Standard Chartered primary account. While a common, but non-statutory practice in the UAE at that time, TASC Outsourcing’s CFO had stated this notification wasn’t going to happen to Gray.

48. As a result, the account was frozen for approximately five months, despite no legal action or default. This left Gray without access to key personal banking facilities during a critical period of transition.

49. Two months later, Gray’s backup HSBC account was also rendered inoperable after the bank received, on information and belief, a tip off by Defendants regarding irregularities in his employment status. These actions, taken together, left Gray with essentially no personal banking

facilities, constituting a deliberate attempt by Defendants to financially squeeze him and restrict his ability to function post-employment.

50. In November 2012, Gray launched a licensed consultancy in the UAE to support a web platform (modeled on TripAdvisor) designed to benchmark recruitment, outsourcing and executive search firms such as Innovations, Derby, First Select, Adecoo, Micheal Page, Robert Half, Transguard, Heidrick & Struggles, Spencer Stuart and Egon Zehnder. It also served as a base for Instant Temps which aimed to monetize unused visa inventory industry-wide with pre-screened visa-ready and compliant staff across all disciplines available to work immediately.

51. The business promoted transparency, advised multinationals and gained regional recognition. Gray was quoted in UAE national media (Exhibit 11) on employment and recruitment trends.

52. Gray's business did not directly compete with TASC and in many respects helped promote TASC Outsourcing. Gray actively promoted TASC as the region's top outsourcing firm in his industry rankings, distributed to over 600 decision-makers including L'Oréal (Exhibit 12) - the very client Shahdadpuri would later falsely claim Gray had passed stolen secrets to." Despite this, Shahdadpuri's position reportedly hardened. Gray was informed through former colleagues of increasing hostility.

53. Shahdadpuri's family, with a reported net worth exceeding \$700 million at the time, held longstanding ties to senior Gulf figures. He frequently implied that his personal influence could create serious legal obstacles for anyone who crossed him. Gray grew increasingly concerned that Shahdadpuri might attempt to leverage that status to pursue baseless criminal allegations.

54. At the time, Gray understood the risks of confronting a wealthy and politically connected adversary in a legal environment where personal influence - commonly referred to as 'wasta' - could, in practice, obscure transparency and delay resolution. This climate of fear and uncertainty arose from Shahdadpuri's threats, not from any inherent shortcomings of the UAE legal system.

55. Given Shahdadpuri's previous threats to jail Gray, he had credible fears for both his safety and liberty given Shahdadpuri's financial resources.

E. Retaliatory Complaint And Misuse Of Legal Process

56. In late 2013 (more than a year after Gray's departure from TASC Outsourcing and six months after leaving the UAE) Shahdadpuri, through his UAE legal representative, filed a criminal complaint against Gray with Dubai Police. The police refused to open a case. Gray was not notified.

57. Following the police refusal, Defendant's legal counsel - acting under Power of Attorney personally given by Shahdadpuri (Exhibit 4) - appealed directly to the Dubai Public Prosecution under application number 145863/2013 (Exhibit 13). The submission included unrelated, years-old internal emails and documents - The Vendetta Files - compiled retrospectively in an attempt to construct a criminal case (Exhibits 10, 14-17 and 26).

58. Gray was accused of criminal intent, breach of trust, disclosure of company secrets, abuse and defamation (Exhibit 18). Shahdadpuri requested that Gray be punished with the most severe penalty under the UAE Federal Penal Code, specifically, imprisonment for not less than one year.

59. Such a sentence, if imposed, would have triggered immediate financial default and exposed Plaintiff to cascading legal consequences in the UAE, including additional penalties and prolonged incarceration. Gray again received no notice of the revised application.

60. Dubai police still declined to open a criminal case and referred the matter back, correctly identifying the lack of merit (Exhibit 19, 20). TASC Outsourcing then requested a private audience with the Public Prosecution to present their allegations in person (Exhibit 21). Gray received no notice.

61. By early 2014, Gray had already relocated from the UAE having taken seriously Shahdadpuri's prior threats to his liberty. It was in Europe, on or around January 23, 2014, that he received a formal legal letter from a UK firm acting for the Defendants. The letter contained

numerous civil allegations including a clause instructing Gray not to share its contents with any clients. Gray, in contemporaneous communications, privately dismissed the claim as baseless "crack pot statements," finding these visible legal threats "hilarious" given his belief in their lack of merit.

62. Gray's assessment was immediately validated by the client Shahdadpuri claimed had been harmed. When Gray transparently informed his senior contact at L'Oréal of the allegations, their representative responded not with business concern, but with the pointed question: 'What have you done to upset him?' This reaction confirmed that key third parties viewed the matter as a personal vendetta by Shahdadpuri, not a legitimate legal dispute (Exhibit 22).

63. Gray, whose location was known to Defendants, replied directly to Shahdadpuri, copying the UK law firm and offered to resolve the matter through proper legal channels and a mutually agreed jurisdiction. No response was ever received. This confidence in a civil resolution, however, would prove tragically misplaced. Gray's assessment was based on the conventional civil threats he could see and defend against. He was unaware this legal letter was merely a smokescreen for a far more insidious attack. Within days of his good-faith offer, Defendants secretly commenced ex parte criminal proceedings in Dubai that would result in an undisclosed travel ban and shadow his career for the next eleven years.

64. Indeed, approximately 10 days later, on 2 February 2014, Shahdadpuri filed a criminal complaint with Dubai Police - transaction number 146001008861 (Exhibit 23). The new complaint contained false, misleading and exaggerated information that also contradicted Defendant's lawyers' earlier filings. Gray received no notice of the filing.

65. At the time of this filing, Defendants - through its UK legal counsel - had recently corresponded with Gray by email, confirming full knowledge of Gray's location and contact details. Despite this, no attempt was made to notify Gray of the criminal complaint, provide him an opportunity to respond, or share his contact information with Dubai Police. This deliberate omission enabled the criminal complaint to proceed unopposed.

66. On 5 February 2014, based on Shahdadpuri's 2 February 2014 criminal complaint, Dubai authorities issued a travel ban ("circular") against Gray, authorizing passport seizure (Exhibit 24). While the action may have initially followed standard protocol under UAE criminal procedure, Exhibit 25 reveals that as late as May 2021 - seven years later - Shahdadpuri was still actively maintaining the case. However, due to Shahdadpuri's failure to provide accurate contact information or disclose prior correspondence or context, the ban was never served, prosecuted, or disclosed to Gray and remained in force for over eleven years.

67. In 2025, acting through UAE legal counsel, Gray secured formal dismissal of the case and removal of the travel ban.

68. Shahdadpuri's campaign of concealment was deliberate. In a July 2025 conversation, former TASC Senior Vice President and Chief Growth Officer Ali confirmed that Shahdadpuri intentionally hid the criminal proceedings from senior managers who might "influence him or go tell" Gray what was happening. Ali, who himself sacrificed 3% equity and an estimated AED 1.2 million in compensation to leave TASC Outsourcing because "he was never going to sell the company", stated that Shahdadpuri would become evasive when the topic around Gray arose. He "by designs kept it away from people" and "conversation around you [Gray] is something he doesn't like talking much about". Ali confirmed "I know so much about his family and things and he would talk to me about, but this is the topic he doesn't talk too much about."

69. Ali further corroborated the purpose of the secret complaint. When directly asked, he confirmed that Shahdadpuri admitted he "put a criminal case" and that as a result, Gray "would not be able to enter the country" thereby confirming the existence, purpose and concealment of the 11-year travel ban.

F. The Pretextual Nature of "The Vendetta Files"

70. Shahdadpuri's entire criminal case rested on six documents:

- (i) A 2011 client frustration email - matter resolved, client retained, company thrived (Exhibit 14),
- (ii) A 2:30 AM Singapore celebration email - apology accepted, promotion followed (Exhibit 15),
- (iii) A screenshot eight months after Gray's departure (Exhibit 16),
- (iv) An October 2012 request for public available information (Exhibit 17),
- (v) An October 2012 email documenting Shahdadpuri's illegal demand for a check (Exhibit 10),
- (vi) A non-binding lifetime non disclosure declaration (Exhibit 26) weaponized to allege a fictitious crime.

71. **(i) Client Frustration Email** - On the 29 June 2011 Gray wrote an internal email to Ali, Shahdadpuri and Sachin Khandelwal ("Khandelwal") in which he used the words "fuck" in relation to a client (Exhibit 14). In his reply Shahdadpuri commented it was not proper to use this in writing. Shahdadpuri then went on to say Ali would handle the account but "this does not mean in any way that Gray has not given the client a fair treatment". The HR matter was resolved and never mentioned again. Almost three years later Shahdadpuri would use this email with the handwritten insignia "ABUSIVE LANGUAGE FOR CLIENT" as he attempted to jail Gray.

72. **(ii) Singapore Celebration Email** - On 5 January 2012 at approximately 02:30 am, Gray replied to a direct-report's internal e-mail from a bar in Clarke Quay, Singapore. The reply came after six hours of heavy drinking which included champagne, shots and beer with colleagues Ali, Khandelwal and Shahdadpuri; only Khandelwal and Shahdadpuri were copied on the message.

73. Though under no obligation, Gray personally funded a thank-you trip for Ali and Khandelwal (paying approximately USD 8,000 for their Singapore Airlines flights and three nights at

the five-star Marina Bay Sands hotel) to thank them for their help achieving 2011 targets.

Shahdarpuri accepted a last-minute invitation and covered his own expenses.

74. The email was addressed to Gray's direct report (a fellow Scotsman and long-time oil and gas industry veteran) with whom Gray often used informal, colloquial language. However in this specific email, Gray wrote "stop being so gay u puftar!!!" and advised him not to be someone's "bitch slave."

75. Upon return to Dubai, Shahdarpuri requested a written apology from Gray, which was provided and accepted (Exhibit 15). Approximately two weeks later Shahdarpuri promoted Gray to Vice President.

76. Two years later, Shahdarpuri used this email to prosecutors as evidence of criminal conduct, omitting the timestamp, location, his presence and the promotion that followed.

Shahdarpuri's handwritten annotation on Gray's apology letter read: 'apology letter for using abusive language on email' - transforming a forgiven moment into evidence for imprisonment.

77. Defendants claim these emails 'caused clients to leave' and 'inflicted material losses' is demonstrably false - no clients departed, revenues grew from \$4M to \$30M and TASC won 'Fastest Growing Company' awards. That Shahdarpuri hoarded routine workplace emails for years, added misleading annotations and stripped critical context when presenting them to prosecutors reveals the retaliatory and calculated nature of these proceedings.

78. **(iii) A Screenshot** - The Defendants' criminal complaint falsely alleged that Gray disclosed pricing secrets to L'Oréal, causing a contract reduction. However, from 2010 to 2013, L'Oreal operated under a transparent 'cost-plus' model with TASC Outsourcing, whereby every line item reflected actual costs plus a fixed percentage markup. This pricing structure was provided to L'Oreal in 2010 by Gray and Shahdarpuri jointly, making 'secret' disclosure impossible - L'Oreal already possessed complete pricing transparency.

79. To support their claim, Defendants submitted a screenshot (Exhibit 16) of June 2013 Request for Proposal (RFP) documents on which Shahdadpuri had circled the creation date. This annotation attempted to suggest criminal involvement, when in fact Gray's name appeared solely due to his legitimate role as L'Oréal's independent consultant helping facilitate their standard procurement process.

80. Shahdadpuri omitted from prosecutors four material facts: (i) L'Oréal's entire regional leadership changed (new MD, CFO and HR Director); (ii) L'Oréal, like all multinationals, conducts routine RFPs every 2-3 years; (iii) L'Oreal had engaged Gray to act as an independent consultant to ensure a fair and transparent RFP process; and (iv) his own damaged relationship with the client following a 2011/2 incident where he boasted of wealth while pleading poverty.

81. These material omissions reveal the truth: L'Oréal's competitive RFP in 2013 (eight months after Gray's departure), in which TASC Outsourcing proposed and accepted their own fees, reflected standard market conditions, not misconduct. That Shahdadpuri sought to criminally prosecute the very consultant who facilitated TASC's successful bid demonstrates a purely vindictive motivation.

82. **(iv) Public Request** - On 4 October 2012 while still employed as Vice-President, Gray emailed TASC's Public-Relations Officer and Head of Operations (both direct reports) requesting a current list of on-demand labour-supply companies for competitor monitoring. 16 Months later Defendants submitted the same email (Exhibit 17) to Dubai police annotated by Shahdadpuri, "BEFORE HE LEFT HE ASKED MAHER FOR A FULL LIST OF OUTSOURCING COMPANIES FOR MUAQAT.COM" and cited it as proof that Plaintiff intended to steal confidential information and violate a non-disclosure declaration, despite the list being a publicly available document.

83. At the time of the request, Gray had not resigned and contemporaneous e-mails show he was scheduled to remain through mid-2013 to complete a full hand-over. Shahdadpuri's recharacterisation of routine, on-the-job competitive intelligence as a trade-secret theft is further

evidence of Defendant's retaliatory motive and lack of probable cause for the Dubai criminal complaint.

84. **(v) Illegal Cheque** - On 30 October 2012, after Shahdadpuri demanded Gray sign a blank check as a condition for releasing earned salary and legal end-of-service benefits (an illegal practice under UAE law), Gray documented this extortion via email to all TASC management (Exhibit 10). The email explicitly stated Gray had 'no intention' of competing and noted his continued professional assistance, including saving TASC AED 90,000 during his handover. Shahdadpuri's handwritten annotation 'email threatening 75% reduction in gross margin' - deliberately omits the critical context: this was Gray's response to being extorted with demands for a blank check.

85. The email's actual content shows Gray: (i) reporting illegal withholding of wages; (ii) emphasizing his ethical handover; (iii) explicitly stating he would not compete; and (iv) continuing to help despite mistreatment. In his police statement, Shahdadpuri transformed Gray's hypothetical statement about market competition (made while rejecting that very path) into a 'threat.' This represents the apex of Defendant's deception: using Gray's refusal to compete as evidence of threatening to compete, while concealing his own criminal demand for a blank check.

86. **(vi) Life NDD & Stolen Secrets** - The declaration Shahdadpuri invoked was executed as Gray was in the process of joining Nikai (his father's company) in February 2010 and not with TASC. This arrangement circumvented Gray's prior non-compete at Shahdadpuri's request by utilizing a Nikai visa. When Gray transitioned to TASC employment 18 months later, no NDA was executed. Consequently, the document Defendants relied on (Exhibit 26) was legally void as to TASC; it failed to name them as a party, was never signed by them and contained no non-solicitation clause. It therefore imposed no enforceable duties on Gray and could not support a good-faith criminal charge for either consulting or for any alleged disclosure of secrets.

87. In November 2013, Defendants cited this declaration as basis for criminal charges under UAE Penal Code Art. 379. They failed to disclose to prosecutors: (i) the declaration was with a different company; (ii) Art. 379 requires identification of specific secrets disclosed; (iii) no secrets

were ever specified, and (iv) no secrets were actually ever disclosed. Invoking a perpetual declaration from a different employer 16 months post-departure confirms the absence of probable cause.

88. During Gray's October 2012 notice period, he disclosed to Shahdadpuri his planned venture: a platform to benchmark recruitment agencies and monetize unused visa inventory industry-wide. Gray explained this would benefit, not compete with TASC. Gray launched this platform in November 2012 yet in September 2017, Shahdadpuri announced 'TascTemp' claiming credit for 'the region's first online temporary staff hiring portal.' The functionality described mirrors Gray's 2012 concept. That Shahdadpuri prosecuted Gray for developing a concept that Shahdadpuri later implemented himself reveals the pretextual nature of these proceedings. The 'stolen secret' was neither stolen nor secret - it was disclosed, approved and eventually copied.

89. These six documents constitute the entirety of Defendant's 'evidence' justifying criminal prosecution and an 11-year travel ban. Spanning 2010-2013, they reveal not criminal conduct but ordinary workplace interactions retrospectively weaponized through Shahdadpuri's handwritten distortions. No financial theft. No client loss. No trade secret disclosure. No actual harm. Just six routine documents from a three-year employment, each annotated years later with Shahdadpuri's fabrications, stripped of exculpatory context and presented to prosecutors who twice refused to proceed before finally issuing a travel ban.

G. Moral Harm And Consequences

90. In 2014, Gray co-founded the digital marketing agency Pilot Fish Media with his business partner. As was publicly reported in The Scotsman (a national newspaper) in December 2014, Pilot Fish Media secured a key contract with the Edrington Group to run social media campaigns for its premium whisky brands, including The Macallan and Famous Grouse (Exhibit 27). The contract officially expanded from five to thirteen countries within one year, including the UAE, with plans for a global digital partnership. Unresolved legal risks in the UAE blocked Gulf expansion, limited growth and forced Gray to exit his stake at a discount.

91. In late 2015, Gray taught himself to code and, within a year, built an enterprise-grade analytics platform. In 2016, Accor, a global hotel operator adopted the platform to track digital performance, expanding by 2017 to cover over 4,000 properties. At the same time, Gray's competitors were raising between \$34 million and \$200 million in institutional funding, with valuations exceeding \$1 billion. Competing at that level would have required similar backing, primarily from New York and Silicon Valley, but unresolved UAE legal risks rendered such capital inaccessible. As a result, the platform remained niche despite enterprise adoption and was used for over 8 years by various hotel brands.

92. In 2022, Gray was approached by a UAE-based business group regarding a global leadership role with a \$1 million compensation package. Due to suspected unresolved legal risks in the UAE, he declined to travel and withdrew from consideration.

H. Discovery Of Misconduct And Basis For Filing

93. Between 2013 and 2017, despite Gray being labelled a criminal by Shahdadpuri, TASC Outsourcing continued to solicit business, partnerships and benefit from Gray's enterprise. These efforts were multiple in nature, documented and were received from all corporate levels within TASC, best exemplified by a 2015 inquiry from a TASC Vice President regarding a potential AED 1,000,000 partnership (Exhibit 28). This demonstrated Defendant's knowledge that Gray posed no legitimate criminal threat, yet they maintained the false complaint to Dubai authorities.

94. Between 2018 and 2023, Gray made documented attempts to contact Shahdadpuri. In a direct 2023 inquiry (Exhibit 29) Gray stated he was planning to travel to Dubai and specifically requested confirmation of any civil or criminal cases filed against him. Shahdadpuri did not respond. Instead, Ali, at that point TASC Outsourcing's Chief Growth Officer replied ambiguously: "If you come, I will." No substantive response or clarification was ever received from TASC Outsourcing.

95. In 2025, after 18 months of working with UAE contacts and legal counsel, Gray obtained official records confirming Shahdadpuri filed a criminal complaint 14 months after Gray's departure. The records included police and prosecution filings, internal correspondence and attached

evidence with handwritten insignia from Shahdadpuri, confirming the complaint's content, timing and procedural history.

96. On 21 March 2025, the Dubai authorities formally dismissed the complaint and cancelled the travel ban.

97. Gray was never notified of the travel ban but had reason to suspect it. It remained in place for over 11 years - blocking access to capital, markets and key opportunities throughout.

98. Gray's inability to resolve the matter earlier resulted directly from Shahdadpuri's concealment of the complaint's existence and content - despite knowing Gray's location and receiving direct inquiries. Shahdadpuri's failure to notify, disclose, or serve any notice rendered meaningful engagement impossible.

COUNT I

(False Imprisonment - Constructive Confinement Via Wrongful Use Of A Foreign Legal System)

99. Plaintiff realleges and incorporates by reference the preceding paragraphs of his Complaint as if fully set forth herein.

100. **Intent to Confine** - Defendants Mahesh Shahdadpuri and TASC Outsourcing acted with specific intent to geographically confine Plaintiff by weaponizing the UAE criminal justice system. This intent is demonstrated by their own conduct: (i) relentlessly pursuing criminal charges despite an initial refusal by Dubai Police and two subsequent rejections by the Dubai Public Prosecution, all for lack of merit; (ii) submitting fabricated evidence and deliberately concealing Plaintiff's known whereabouts from authorities; (iii) requesting the "most severe penalty" of at least one year's imprisonment for a meritless claim; and (iv) former SVP and Chief Growth Officer of TASC Outsourcing Abbas Ali's confirmation that Shahdadpuri's explicit purpose was to ensure Plaintiff "would not be able to enter the country".

101. **Constructive Confinement** - The ex parte travel ban issued on February 5, 2014, functioned as a standing arrest order that converted the UAE into a "forbidden zone" and operated as a constructive prison with both regional and global reach:

a. GCC Reach - The circular placed Plaintiff at a credible risk of detention throughout the Gulf Cooperation Council region, effectively barring him from the entire Arabian Peninsula where his professional expertise was concentrated.

b. Global Aviation Choke Point - Because the UAE is a principal global aviation hub, any emergency flight diversion or routine layover could trigger Plaintiff's immediate arrest, forcing him onto inefficient, multi-day detours and impairing his ability to engage with partners and capital markets in New York and Asia.

c. Financial Blacklisting in New York - The secret criminal complaint had a direct, foreseeable and intended impact in New York: it made Plaintiff un-investable. The existence of the complaint rendered him unable to obtain a basic police clearance certificate from the UAE, a standard and often non-negotiable requirement for the due diligence process of sophisticated New York-based investors and financial institutions. This official barrier, combined with the practical impossibility of obtaining a reference from his most significant recent employer (the very man who was secretly prosecuting him) effectively blacklisted Plaintiff from the capital markets he sought to engage.

102. **Plaintiff's Awareness of the Confinement** - Plaintiff first received an unverified tip in late 2024 from a UAE legal contact that a criminal complaint carrying "at least two months in jail" existed, but that tip did not identify the complainant, the existence of an ex parte travel ban, or the specific charges. After retaining counsel, Plaintiff obtained documentary proof on 17 March 2025 that Defendants had in fact procured an active travel-ban arrest order. The ban remained in force until it was formally lifted on 21 March 2025. Accordingly, Plaintiff was conscious of the confinement for

approximately four days while it was still operative, satisfying the awareness element of false imprisonment.

103. **Defendants' Fraudulent Concealment** - Any delay in Plaintiff's discovery of the confinement was the direct result of Defendants' own fraudulent concealment. By deliberately withholding Plaintiff's known contact information from Dubai authorities, Defendants ensured the ban would issue ex parte. By refusing to answer Plaintiff's direct inquiry in 2023 about the existence of any criminal cases, they actively prevented him from discovering the truth sooner. Defendants cannot now benefit from a delay that their own deceptive conduct created.

104. **Absence of Consent** - At no time did Plaintiff authorize, agree to, or acquiesce in any restriction on his travel or personal liberty. Defendants' deliberate concealment of the proceedings deprived him of any opportunity to consent or object, rendering the restraint wholly non-consensual.

105. **Lack of Privilege or Legal Justification** - The confinement was unlawful because Defendants lacked any colorable probable cause, as evidenced by: (i) Dubai authorities' three prior refusals to open a case for want of evidence; (ii) Defendants' use of material misrepresentations to procure the ban; and (iii) the Dubai Public Prosecution's ultimate dismissal of the matter on 21 March 2025. Confinement procured by false information is not privileged under New York law.

106. **Injury and Need for Declaratory Relief** - Defendants' wrongful restraint foreclosed Plaintiff's access to Gulf-region business opportunities, impaired his ability to raise capital from New York investors and subjected him to severe emotional distress. These injuries establish a justiciable controversy. Plaintiff seeks a declaratory judgment that the travel ban was wrongfully procured and maintained and a nominal award of one U.S. dollar.

107. **Timeliness** - This action was commenced within one year of the date the restraint terminated (March 21, 2025) and is therefore timely under CPLR § 215(3).

COUNT II**(Intentional Infliction Of Emotional Distress)**

108. Plaintiff realleges and incorporates by reference the preceding paragraphs of his Complaint as if fully set forth herein.

109. **Extreme and Outrageous Conduct** - From October 2012 through March 2025, Defendants waged a deliberate, multi-year campaign to terrorize Plaintiff through direct threats and calculated deception - a course of conduct so extreme and outrageous that it transcends all bounds of civilized society. This campaign included:

- a. Extortion and Threats: Initially threatening to imprison Plaintiff and demanding an illegal cheque as a condition for releasing earned wages (a criminal act of coercion under UAE law).
- b. Weaponization of a Foreign Legal System: After Plaintiff refused to be extorted, Defendants maliciously initiated a foreign criminal complaint. They persisted even after Dubai Police and Public Prosecution refused to open a case for lack of merit three times, demonstrating a vindictive motive far beyond any legitimate legal dispute.
- c. Fraudulent Submissions: Knowingly submitting a collection of distorted, out-of-context, and fabricated evidence - The Vendetta Files - to prosecutors, including documents with misleading handwritten annotations by Shahdarpuri, to manufacture a false narrative of criminal conduct.
- d. Deliberate Concealment: Intentionally hiding the existence of the criminal complaint and the resulting 11-year travel ban from the Plaintiff, despite knowing his location and having direct contact. Defendants actively concealed the proceedings to ensure they would proceed ex parte, depriving Plaintiff of his right to be heard.

e. Perpetuation of Fear: Refusing to answer Plaintiff's outreach attempts between 2018 and 2023 and the direct inquiry about the existence of a criminal case, thereby actively perpetuating his state of fear and uncertainty.

110. This conduct is rendered all the more outrageous by Defendants' simultaneous and calculated cultivation of a false public persona. While secretly maintaining this covert persecution, Defendant Mahesh Shahdarpuri publicly proclaimed on LinkedIn that at TASC Outsourcing "We don't let anyone down; we have our associates and customers backs" and that culture "is how we show up when no one's watching" (Exhibit 2). This calculated duplicity, covertly trying to destroy a former employee's life while publicly preaching about "purpose of creating opportunities, impacting lives! :-)" while posing next to Bill Gates in a selfie (Exhibit 1), represents a level of malicious hypocrisy that is "utterly intolerable in a civilized community."

111. **Intent to Cause Severe Emotional Distress** - Defendants acted with specific intent to cause, or with reckless disregard of the substantial probability of causing Plaintiff severe emotional distress. This malicious state of mind is not a matter of inference but is established by Defendants' own admissions and the calculated nature of their actions. Defendants' goal was the complete personal and professional destruction of the Plaintiff. This is proven by:

a. The Stated Objective: Defendant Shahdarpuri's own legal filings demanded the "most severe penalty" of at least one year's imprisonment, a request far exceeding any conceivable commercial dispute and aimed squarely at depriving Plaintiff of his liberty.

b. The Admitted Purpose: As confirmed by former TASC Senior Vice President Abbas Ali, Shahdarpuri's explicit purpose was not justice, but entrapment or exile. He filed the secret complaint specifically to ensure Plaintiff "would not be able to enter the country," thereby knowingly turning the UAE into a prison for him.

112. **Reckless Disregard and Calculated Malice** - Even absent direct admissions, Defendants' intent is demonstrated by their reckless disregard for the inevitable harm their actions would cause. No reasonable person could doubt that a secret, multi-year criminal proceeding,

carrying the threat of imprisonment, would cause profound and severe emotional distress. The calculated nature of this campaign further proves intent:

- a. The decision to proceed after multiple rejections by the police and prosecution reveals a vindictive obsession that ignored all objective signs that the claim lacked merit. No reasonable person would forgive an employee, promote him, then secretly attempt to imprison him using the forgiven conduct as evidence.
- b. The deliberate concealment of the proceedings from Plaintiff while knowing his location and whilst soliciting his business, proves the intent was to prevent him from defending himself, maximizing his powerlessness and anxiety.
- c. This entire covert campaign was prosecuted while Defendant Shahdadpuri meticulously curated a public persona of a benevolent philanthropist. This "Jekyll-and-Hyde" conduct is not a defense; it is proof of a calculated, compartmentalized malice, demonstrating he was fully aware of his actions and their consequences, yet proceeded anyway. Defendant's vindictive campaign of persecution culminated in a grotesque abuse of Dubai's legal system, weaponizing criminal law to satisfy a personal vendetta while maintaining a façade of professional collegiality.
- d. The entire campaign, from the initial threat to the decade of concealment, was calculated to create a constant state of fear, anxiety and powerlessness.

113. **Causal Nexus** - Each component of the severe distress Plaintiff endured is a direct and foreseeable consequence of Defendants' specific wrongful acts. The link between conduct and injury is clear and unbroken:

- a. The Life Restructuring: Defendants' deliberate concealment of the arrest warrant directly necessitated the strategic, life-altering decisions Plaintiff was forced to make. Because the threat was both severe and unverifiable, relocation and the forfeiture of business opportunities

were not emotional reactions, but rational counter-measures to mitigate the undisclosed risk Defendants imposed.

b. The Professional Handicap: The covert nature of the campaign was the direct cause of Plaintiff's business handicap. His inability to explain to partners and investors why entire markets were off-limits stemmed directly from Defendants' success in hiding their actions from both him and the public.

c. The Psychological Burden: The corrosive psychological strain was directly caused not only by the threat itself but by the calculated duplicity of Defendants' public posturing. It was entirely foreseeable that forcing an individual to silently watch their persecutor be celebrated for integrity would compound the emotional and operational burden.

114. In every respect, Plaintiff's injuries flow directly and predictably from Defendants' malicious and orchestrated campaign.

115. **Severe Emotional Distress** - Defendants' conduct imposed a severe and sustained psychological and operational burden that necessitated a complete restructuring of Plaintiff's professional and personal life. The harm was not a passive state of anxiety, but the active, daily cognitive load of managing a concealed, high-stakes threat.

116. Faced with an unquantifiable risk of wrongful arrest, Plaintiff made a series of calculated, strategic decisions to mitigate it. These counter-measures included relocating his family, systematically avoiding travel through key global hubs and foregoing specific, high-value opportunities tied to Gulf and US markets.

117. The covert nature of the threat created a profound business handicap. Plaintiff was forced to operate under a constant, undisclosed risk, rendering him unable to explain to partners or investors why entire regions were strategically off-limits. Compounding this operational burden was the psychological toll of Defendants' duplicity - a uniquely corrosive strain inflicted by watching the architect of this secret persecution publicly celebrated for his integrity.

118. That Plaintiff nonetheless built successful ventures is not evidence of an absence of harm, but a testament to the resilience required to operate for over a decade under such a deliberate and sustained assault. This strength does not mitigate the injury; it quantifies the extraordinary burden Defendants wrongfully imposed.

119. **Non-Duplication** - This Count seeks redress for the emotional and psychological harm arising from Defendants' broader campaign and is therefore not duplicative of Count I, which addresses Plaintiff's constructive confinement.

120. **Timeliness** - The claim is timely under CPLR § 215(3) because Defendants' continuous misconduct ended only on 21 March 2025, when the travel ban was lifted; suit was filed within one year and any earlier accrual is tolled by Defendants' fraudulent concealment.

121. **Damages and Relief** - Plaintiff therefore seeks compensatory and punitive damages for an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands judgment, jointly and severally, against all Defendants as follows:

A. On Count I (False Imprisonment), a DECLARATORY JUDGMENT that the UAE travel ban was wrongfully procured and maintained, together with NOMINAL DAMAGES of one U.S. dollar;

B. On Count II (Intentional Infliction of Emotional Distress), COMPENSATORY DAMAGES for emotional and reputational injuries in an amount to be determined at trial;

C. PUNITIVE DAMAGES on all counts where legally available, in an amount sufficient to deter Defendants' willful misconduct;

D. PRE- and POST-JUDGMENT INTEREST, the COSTS and DISBURSEMENTS of this action; and

E. Such other and further relief as the Court deems just and proper.

Dated: September 15, 2025
Paris, France

By: */s/ Adam TW Gray*

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